

9/16/1993

MEMORANDUM

SUBJECT: Chlorpyrifos. Waiver for Magnitude of the Residue in Dill and Okra.
Reregistration Case No. 0100. Chemical No. 059101. No MRID #.
DP Barcode D194679. CBRS #12,483.

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THRU: Edward Zager, Chief
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TO: Joanne Edwards, PM Team 73
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The Chlorpyrifos SRR Residue Chemistry Chapter (10/14/88) concluded that no magnitude of the residue data are available reflecting use of chlorpyrifos on okra and dill. Additionally, magnitude of the residue data in meat/milk, reflecting dermal treatment of cattle, sheep, and goats, were required.

DowElanco, in a letter to the Agency dated 12/20/91, requested a waiver from conducting magnitude of the residue studies for okra and dill because none of DowElanco's chlorpyrifos containing products are registered for use on these commodities. DowElanco also requested waivers from the required meat/milk studies because they no longer have any products for animal use containing chlorpyrifos as the active ingredient.

Tolerances of 0.1 ppm have been established for the combined residues of chlorpyrifos and its metabolites 3,5,6-trichloro-2-pyridinol in or on dill and in or on okra as members of the seed and pod vegetables group. A tolerance of 0.1 ppm, not more than 0.05 ppm of which is chlorpyrifos, has been proposed for the combined residues of chlorpyrifos and its metabolites 3,5,6-trichloro-2-pyridinol in or on dill and in or on okra as members of the seed and pod vegetables group (PP#3F2884).

CBRS has examined the REFS database for the following DowElanco products containing chlorpyrifos as the active ingredient (EPA Reg. No. is in parentheses): Lorsban 15 G (62719-34), 4E (62719-23), 4E-HF (62719-220), 50SL (62719-22), 50W (62719-39), and 7.5G (62719-85). According to REFS, none of these products have registered uses on okra or dill. Also according to REFS, none of DowElanco's products containing chlorpyrifos as the active ingredient are registered for dermal use on livestock.

Conclusions

CBRS has no objections to granting waivers for magnitude of the residue studies for okra or dill, or magnitude of the residue studies in meat/milk resulting from dermal application of chlorpyrifos to livestock. The RED for chlorpyrifos will recommend that tolerances for residues of chlorpyrifos in or on okra and dill (seed pod vegetables) be revoked. CBRS notes that REFS indicated some products (none from the registrant DowElanco) containing chlorpyrifos as the active ingredient are registered for use on okra, dill, and livestock. These data are required from these registrants if they are going to support these uses.

cc: S.F., circ., R.F., List B File, S.Knizner
RDI: M.Metzger, 9/16/93
H7509C:CBRS:CM#2:305-6903:SAK:sak:Chlorpyr.wvr:9/16/93